



THE QUALITY CHICKEN PEOPLE

ALLEN FAMILY FOODS, INC.
274 NEALSON STREET
P.O. BOX 1030
HURLOCK, MD 21643
410/943-3989 FAX: 410/943-0174

CHK #108638
Rec #753192
\$150.00

July 12, 2002

DNREC
Division of Water Resources
89 Kings Highway
Dover, DE 19901

Attn: Ms. Amber Moore

Re: Updated SWP³ Plan Submission for Allen Family Foods, Inc.
Harbeson Processing Plant

Dear Ms. Moore:

As requested, I am addressing your concerns from your initial review of the SWP³ plan for the Harbeson Processing Plant. The following specific items are addressed and correspond to the bullet items in your letter:

1. We have chosen Option #2, which requires material management requirements and discharge buffering. Material management is already addressed in the plan and an implementation schedule/timeline will be put together for these and buffering requirements.(SWP³ Inserts enclosed)
2. The two 12" culverts discharge to the stormwater pond, shown on Figure 2 as the "existing stormwater holding lagoon".
3. The stormwater from the truck wash area drains to the stormwater pond shown in Figure 2 as the "existing stormwater holding lagoon".
4. Figure 2 of the SWP has been redlined to show the area which has been designated for dumping totes of ice. Attached is a copy of the portion of the plan to show this has been completed.



I have also enclosed a completed NOI with the required fee.

If you have any questions, please feel free to contact me at (410) 943-3989 x 182.

Respectfully submitted,
ALLEN FAMILY FOODS, INC.

A handwritten signature in black ink, appearing to read "Robert J. Mitchell", with a long horizontal line extending to the right.

Robert J. Mitchell, R.S.
Corporate Environmental Manager

Attachments:

1. Red lined Figure 2
2. SWP³ Inserts
3. Completed NOI
4. Yearly Fee for NOI

cc: Tom Brinson

FORM
3-GP.SW/00

DNREC

Delaware Department of Natural Resources and Environmental Control
NOI Form for obtaining coverage through
**The Regulations Governing Storm Water Discharges Associated With
Industrial Activity** (Section 9, Subsection 1)

Submission of this form serves as a notification of the intention of the facility identified on this form, to adhere to provisions of **The Regulations Governing Storm Water Discharges Associated With Industrial Activity** (NPDES Storm Water General Permit Program). THIS FORM MUST BE COMPLETE IN ORDER TO OBTAIN PERMIT COVERAGE. PLEASE REFER TO THE DIRECTIONS REGARDING THE YEARLY FEE THAT IS REQUIRED UPON SUBMISSION.

1) Name of Facility Noticing Intent: ALLEN FAMILY FOODS, INC.
Address: PO BOX 63
HARBESON, DE 19951
Latitude: 38 43 14.0 Longitude: -075 17 19.0

2) Name of the contact person responsible for facility compliance with the (NPDES Storm Water General Permit): TOM BRINSON Telephone: (302) 684-1640

3) Up to four SIC codes which describe the activities of the facility:

2015

4) Name of the waterbody or municipal (public) storm system which receives storm water runoff from the facility: BEAVER DAM CREEK

5) Is the facility subject to SARA Title III, Section 313 requirements? (Yes or No) Y

6) Certification:

"I certify under penalty of law this document and all attachments were prepared under my direction, or supervision, in accordance with a system designed to assure that qualified personnel gathered and evaluated the information submitted. Based upon my inquiry of the person(s) directly responsible for gathering the information, the information is, to the best of my knowledge, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for willful violations."

PRINT NAME AND TITLE: ROBERT J. MITCHELL, CORP. ENV. MGR.

SIGNATURE:  DATE: 7-12-02

4.0 COMPLIANCE RESPONSIBILITIES

4.1 Implementation of Best Management Practices

The Best Management Practices specified in the previous chapter are recommended for implementation. The four (4) essential elements to successful implementation are:

- Development of a detailed implementation schedule, work orders issued via EMS system.
- Assignment of specific individuals with responsibility for implementing aspects of the plan and/or monitoring their implementation.
- Management approval of implementation schedule and strategy. Summary of suggestions received from inspections.
- Regularly scheduled implementation progress reports to management.

INSERT 7-10-02-1

The certification signature of the management representative in the beginning of this document signifies commitment to scheduling implementation of proposed improvements. During construction of improvements, the pollution prevention team leader should submit an implementation progress report to management on an basis

4.2 Annual Site Compliance Evaluation

The pollution prevention team shall be responsible for conducting annual site compliance evaluations. **This site compliance audit will be in the form of a Work order.** The evaluations shall be conducted by team members and/or individuals specifically designated by the team. All persons who conduct compliance evaluations shall be familiar with the facility's operations and the SWP goals and requirements. Furthermore, inspectors shall have the ability to make necessary management decisions or have direct access to management.

The annual compliance evaluation shall provide the basis for evaluating the overall effectiveness of the SWP. The specific goals of the evaluation shall be to verify that the description of potential pollutant sources contained in the plan is accurate, that the plan drainage map is accurate or has been updated to reflect current conditions, and that the controls identified in the

BP Environmental, Inc.
Phone: (302) 629-6505
Fax: (302) 629-6722

Insert 7-10-02-1

Management of Significant Material by a Combination of Protocols (Option 2), as described in Section 2.0 and 3.0 of this SWP and Discharge Buffering will be implemented.